

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-F and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: June 3, 2016

EXHIBIT A – CORY WATSON, P.C.

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-17395	Emily K. Mitch v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – MILLER WEISBROD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-05830	Sherry L. Boudro v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-25655	Karen D. White v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – NEMEROFF LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-04776	Laura L. Tackett v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT D – SUMMERS & JOHNSON PC

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-16167	Sharlene Stapelman, Ronald Stapelman v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT E – THE NATIONS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-09527	Joyce Eileen Sayre, David J. Cardinal v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-18904	Deborah Lynn Young v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – THE POTTS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-14115	Susan Penegor, Bruce Charles Penegor v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis